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Dr. Ruth Lunn
Director
Office of the Report on Carcinogens
DNTP, NIEHS
P.O. Box 12233
MC K2-14
Research Triangle Park, NC 27709
lunn@niehs.nih.gov

Re: Proposed NTP Review Process for the Report on Carcinogens:
Request for Public Comment, 76 Fed. Reg. 67200, (Oct. 31, 2011)

Dear Dr. Lunn:

The General Electric Company appreciates the opportunity to comment on the National Toxicology Program's "Proposed Report on Carcinogens Review Process" ("Proposed Process"). The Report on Carcinogens (RoC) is an influential document. GE therefore supports changes to the review process aimed at ensuring that the RoC reflects a systematic, objective, transparent evaluation of all the relevant science.

We note at the outset that commenting on the proposed changes to the review process would have been easier if the NTP had explained either in the Federal Register notice or in the Proposed Process how it differs from the current process, and how the proposed changes would improve both the process and the substantive quality of the RoC. The NTP did not do that. Instead, the NTP simply described the proposed process. The public was left to figure out for itself how the proposed process differs from the current process, and to guess at how NTP expects the changes will lead to improvements in the RoC.

We share the concerns expressed by all of the public commenters during yesterday's Listening Session that the proposed changes will not, in fact, improve either the process for preparing, or the substance of, the RoC. The proposed changes to the review process seem to be focused exclusively on accelerating the process of preparing the RoC, without regard to the impact that will have on the quality of the RoC. There is no discussion in the Proposed Process of how the substance of the RoC could be improved by, for example, adopting standardized approaches and criteria for identifying, evaluating and synthesizing relevant studies and determining causality. We strongly encourage the NTP to carefully consider and to adopt the specific suggestions for improving both the process and the substance of the RoC that were made by the public commenters during yesterday's Listening Session.

All of the public comments presented during the Listening Session were highly critical of the Proposed Process, and there were many specific suggestions for improvements. It therefore is difficult to imagine that the NTP can meaningfully consider and address those comments and still meet its December 15th deadline for presenting the final revised process to the NTP's Board of Scientific Counselors. If the NTP truly values public comment, the NTP should postpone the presentation to the Board until the NTP can analyze the public comments; provide a written response that clearly explains NTP's reasons for accepting or rejecting the comments; and publish for public comment a revised draft process accompanied by an explanation of the changes that have been made and the reasons why the NTP believes the changes will improve both the process for preparing the RoC and the substantive quality of the RoC.

Thank you for your consideration of these comments.

Sincerely,

[Redacted]

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